

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

NOTICE OF FILING OF THE PARTIES' JOINT GLOSSARY

The Parties hereby notify the Court that they have agreed to a Joint Glossary (“Glossary”) as discussed most recently at the hearing on September 4, 2024 to be available to assist the Court as the trial proceeds. The Glossary is attached hereto as Exhibit A.

Dated: September 8, 2024

Eric Mahr (*pro hac vice*)
Julie S. Elmer (*pro hac vice*)
Andrew J. Ewalt (*pro hac vice*)
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
700 13th Street NW, 10th Floor
Washington, DC 20005
Telephone: (202) 777-4500
Facsimile: (202) 777-4555
eric.mahr@freshfields.com
julie.elmer@freshfields.com
andrew.ewalt@freshfields.com

Justina Sessions (*pro hac vice*)
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
855 Main Street
Redwood City, CA 94063
Telephone: (650) 618-9250
justina.sessions@freshfields.com

Daniel S. Bitton (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
55 2nd Street
San Francisco, CA 94105
Telephone: (415) 490-2000
Facsimile: (415) 490-2001
dbitton@axinn.com

Respectfully submitted,

/s/ Craig C. Reilly
CRAIG C. REILLY (VSB # 20942)
209 Madison Street
Alexandria, VA 22314
Telephone: (703) 549-5354
Facsimile: (703) 549-5355
craig.reilly@ccreillylaw.com

Karen L. Dunn (*pro hac vice*)
Jeannie Rhee (*pro hac vice*)
William Isaacson (*pro hac vice*)
Amy J. Mauser (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street NW
Washington, DC 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
kdunn@paulweiss.com
jrhee@paulweiss.com
wisaacson@paulweiss.com
amauser@paulweiss.com

Bradley Justus (VSB # 80533)
David Pearl (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
1901 L Street NW
Washington, DC 20036
Telephone: (202) 912-4700
Facsimile: (202) 912-4701
bjustus@axinn.com
dpearl@axinn.com

Counsel for Google LLC

FOR PLAINTIFFS:

/s/ Julia Tarver Wood
JULIA TARVER WOOD
MICHAEL J. FREEMAN
BRENT NAKAMURA

United States Department of Justice
Antitrust Division
450 Fifth Street NW, Suite 7100
Washington DC 20530
Telephone: (202) 307-0077
Facsimile: (202) 616-8544
Email: Julia.Tarver.Wood@usdoj.gov
Email: Michael.Freeman@usdoj.gov

Attorneys for the United States

JASON S. MIYARES
Attorney General of Virginia

/s/ Tyler T. Henry
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia
202 North Ninth Street
Richmond, VA 23219
Telephone: (804) 692-0485
Facsimile: (804) 786-0122
Email: thenry@oag.state.va.us

Attorneys for the Commonwealth of
Virginia and local counsel for the
States of Arizona, California,
Colorado, Connecticut, Illinois,
Michigan, Minnesota, Nebraska,
New Hampshire, New Jersey, New York,
North Carolina, Rhode Island,
Tennessee, Washington, and West
Virginia

Exhibit A

Joint Glossary

Term	Definition
(Ad) Inventory	The space accompanying publishers' digital content in which an advertiser's ad can be placed. When a user visits a publisher's digital property, an impression is created in the inventory space. Publishers monetize their ad inventory by selling individual impressions to advertisers.
Ad exchange(s)	A tool that connects owners of digital content where people see ads ("publishers"), who have ad inventory to sell, with advertisers looking to place ads, often (but not always) directly through an auction-based system via advertising buying tools. Ad exchanges are sometimes referred to as supply-side platforms (SSPs).
Admeld	A yield manager that Google originally acquired in 2011.
Advertiser buying tool/buy-side tool/bidding tool	A tool that provides advertisers the opportunity to purchase digital advertising inventory. Examples include Google's offerings Google Ads and DV360.
AdX	Google's ad exchange, now accessible through the Google Ad Manager user interface.
Authorized Buyers	Non-Google advertiser buying tools that are authorized by Google to participate in AdX auctions.
AwBid	A Google program through which advertisers using Google Ads can purchase certain types of digital advertising inventory via non-Google ad exchanges.
Buy-side	The advertiser or advertiser-facing side of digital advertising.
Cost per click (CPC)	A quantitative metric capturing how much advertisers pay for each instance in which a user clicks on their ad. Defined as advertiser cost divided by clicks. When advertisers are charged on a CPC basis, they pay for an ad only when the user shown the ad clicks on it.
Cost per mille (CPM)	A quantitative metric capturing how much advertisers pay per thousand (mille) impressions. Defined as advertiser cost divided by impressions (in thousands).
Demand side platform ("DSP")	A type of advertiser buying tool that allows advertisers to manage and submit real-time bids for digital advertising inventory.

Term	Definition
Direct transactions	Also known as a direct sale or direct purchase. A digital advertising transaction in which a publisher sells its inventory directly to an advertiser (i.e., not through third-party intermediaries, or in which the role of third-party intermediaries is lessened). Direct sales can occur both via automated (i.e., programmatic) and non-automated means.
Display & Video 360 (“DV360”)	One of Google’s advertiser buying tools. Formerly known as DoubleClick Bid Manager (DBM).
Display advertising	A visual type of digital advertising that relies on animation, images, text, and/or video. Display advertising can appear on internet-connected devices including desktop and laptop computers, tablets, and mobile phones (including in apps), and connected TV devices.
DoubleClick for Publishers (“DFP”)	Google’s publisher ad server, now accessible through the Google Ad Manager user interface. Google originally acquired DFP through its acquisition of DoubleClick in 2008.
Enhanced Dynamic Allocation (EDA)	A feature of DFP that allows indirect sales to compete with direct sales, including those with guaranteed commitments.
First-price auction	An auction in which the winner of the auction is the bidder with the highest bid, and that bidder pays its bid.
Google Ads	Google defines Google Ads as its “advertiser-facing component of Google’s ad network, which advertisers can use to set up media campaigns to show digital ads on Google-owned inventory and third-party partner websites.”
Header bidding	A technology through which publishers can solicit and receive bids for their ad inventory. “Client-side” implementations of header bidding involve sending ad requests and receiving bids via code on the publisher’s site; “server-side” implementations involve a centralized server sending ad requests and receiving bids.
Header bidding wrapper	A container for header bidding code.
Impression	A single digital advertisement shown (or to be shown) for a single user on a single occasion. An impression is created when an internet user visits a digital property, and advertisers purchase individual

Term	Definition
	impressions to show ads to the specific internet user viewing the digital property at a given time.
Indirect transactions	Also known as an indirect sale or indirect purchase. A digital advertising transaction in which a publisher sells an impression indirectly to an advertiser (i.e., through third-party intermediaries). Indirect sales often occur through an automated (i.e., programmatic) auction process in which an impression (generated when a user visits a publisher's digital property) is auctioned to advertisers.
Line Items	Information that publishers enter into a publisher ad server (including DFP) regarding sources of ads that can be served on the publishers' properties, including priority, targeting, and pricing information.
Open Auction Transaction	A digital advertising transaction in which the impression is auctioned and in which most or all of the buyers with access to the exchange can participate in the auction.
Owned and operated (O&O) inventory	Owned & operated inventory is sometime referred to as "O&O."
Preferred deal (PD)	A type of programmatic direct transaction in which a specific buyer is given an initial (i.e., preferred) opportunity to buy an impression (but the purchase/sale is not guaranteed).
Private Auction/Private Marketplace	A digital advertising transaction in which an impression is offered to a limited set of buyers/advertisers selected by a publisher or small group of publishers.
Programmatic direct	A direct transaction in which aspects of the transaction are automated.
Programmatic guaranteed (PG)	A type of programmatic direct transaction in which a publisher's inventory is reserved (i.e., guaranteed) for a specific buyer.
Publisher	An owner/operator of a digital property where users can be shown advertisements.

Term	Definition
Publisher ad server	A tool that helps publishers manage and sell their ad inventory, including deciding what ad to show to a specific user and then displaying that ad on the publisher's digital property. Publisher ad servers manage both direct and indirect ad transactions. The publisher ad server generally contains the ultimate logic determining how the publisher's ad inventory is allocated.
Real-time bidding (RTB)	A method of submitting bids into an auction for the sale of an impression, tailored to the specific characteristics of the impression being sold, within the fractions of a second between which the impression is generated (i.e., the time at which the user visits the publisher's digital property) and then sold.
Revenue per mille (RPM)	A quantitative metric capturing how much publishers receive per thousand (mille) impressions. Defined as publisher revenue divided by impressions (in thousands).
Revenue Share / Take Rate	A term used to describe a fee charged by ad tech intermediaries. For example, if an ad exchange retains 20 percent of buyers' spending through the exchange on average, the exchange's average revenue share or take rate is 20 percent.
Second-price auction	An auction in which the winner of the auction is the bidder with the highest bid, and that bidder pays the amount of the second-highest bid (or the price floor, whichever is higher).
Sell-side	The publisher or publisher-facing side of digital advertising.
Supply-side platform (SSP)	See "ad exchange."
Waterfall	A process by which publisher ad servers would solicit or call different demand sources sequentially to sell an ad impression.